

REMARKS

The Office Action mailed November 30, 2004 has been reviewed and carefully considered.

Claims 1-32 are pending.

Claims 1-6, 11-16, 18-23, and 27-32 stand rejected under 35 U.S.C. §102(e) as being unpatentable over United States Patent No. 6,160,545 to Eyer et al. (hereinafter "Eyer"). Claims 7-10, 17, and 24-26 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Eyer in view of United States Patent No. 6,172,677 to Stautner et al. (hereinafter "Stautner").

It is respectfully asserted that none of the cited references teach or suggest "channel mapping information enabling a user of said decoding apparatus to select between different groups of broadcast services collated by area", as recited in independent Claims 1, 15, 18, 31, and 32.

Moreover, it is respectfully asserted that none of the cited references teach or suggest "channel mapping information suitable for enabling a user of a reproduction device for playing said digital data to be able select between different groups of broadcast services and associated tables and objects collated by area", as recited in independent Claim 16.

Rather, the cited section of Eyer with respect to channel mapping information (namely, col. 8, line 64 to col. 9, line 20) simply discloses the following:

Channel map data is also transmitted to the IRD 300. The IRD 400 can use two channel maps for navigation, namely, one satellite channel map, which is common to all IRDs, and one CATV channel map, which is CATV network-specific. Recall that a **single interactive program guide (IPG) region may be defined by one or more CATV networks**. CATV channel maps may be recovered by the corresponding IRDs according to the assigned CATV network identifier. The identifier may be addressed to

each IRD using a unit identifier which is unique to each IRD. Multicast addressing enables the high-speed delivery of the channel maps. **The filter 335 or an analogous function can filter out all CATV network-specific channel maps except the channel map for the CATV network to which the specific IRD 300 is assigned.**

For example, there may be several CATV networks (networks A, B, C, ...) in a single IPG region, such as a large urban area. Each CATV network will have its own channel map data. **Each IRD will be assigned to a specific CATV network and IPG region** by unit-addressed CATV network identifiers and IPG region identifiers, respectively.

Thus, according to the above cited section of Eyer: an IPG Region can be defined by one or more CATV networks; IRD 300 can use only one CATV channel map that is CATV network-specific; and all CATV network specific channel maps are filtered out except the (single) channel map for the CATV network to which the specific IRD is assigned.

Accordingly, although an IPG region can be defined by one or more CATV networks, an IPG region is limited herein to **ONLY ONE** CATV network, since an IRD 300 can use only one CATV channel map (which is CATV network-specific).

Thus, there is no disclosure or suggestion in Eyer that the channel map data disclosed therein enables a user of the decoder to select between different groups of broadcast services collated by area, as essentially recited in Claims 1, 15, 16, 18, 31, and 32. This is not surprising, since in Eyer, the area (and, thus, the services corresponding to that area) is limited to only one area (since each IRD is assigned only one specific CATV network). Therefore, there is no need for allowing a user of the invention of Eyer to select between different groups of broadcast services collated by area since the selection of area has already been made for the user, by limiting the user to a single CATV network in an IPG region (even though more than one CATV network may exist in the IPG region).

For example, as disclosed by Eyer, “[c]hannel map data provides a correspondence between the programming services and a channel identifier which is displayed to the user, such as a channel number, “source identifier” which identifies the programming service provider and/or station identifier (e.g., ABC, NBC)” (Eyer, col. 4, lines 36-41). However, there is no disclosure or suggestion in Eyer that the channel map data in Eyer provides a correspondence between broadcast services and **area**, as essentially recited in Claims 1, 15, 16, 18, 31, and 32.

Moreover, even assuming *arguendo* that Eyer does in fact disclose that the channel map data corresponds to different areas (which it may not, since more than one CATV network may be located in a single IPG region (see, e.g., Eyer, col. 9, lines 1-2)), there is no disclosure that a user is allowed to select between different groups of broadcast services collated by area as is essentially recited in Claims 1, 15, 16, 18, 31, and 32.

A reference cited against a claim under 35 U.S.C. §102 must disclose each and every limitation of the rejected claim. Accordingly, independent Claims 1, 15, 16, 18, 31, and 32 are patentably distinct and non-obvious over the cited reference for at least the reasons set forth above.

Claims 2-14 depend from Claim 1 or a claim which itself is dependent from Claim 1 and, thus, include all the limitations of Claim 1. Claim 17 depends from Claim 16 and, thus, includes all the limitations of Claim 16. Claims 19-30 depend from Claim 18 or a claim which itself is dependent from Claim 18 and, thus, include all the limitations of Claim 18. Accordingly, Claims 2-14, 17, and 19-30 are patentably distinct and non-obvious over the cited references for at least the reasons set forth above with respect to Claims 1, 16, and 18, respectively.

Accordingly, reconsideration of the rejection is respectfully requested.

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**PATENT
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In view of the foregoing, Applicants respectfully request that the rejection of the claims set forth in the Office Action of November 30, 2004 be withdrawn, that pending claims 1-32 be allowed, and that the case proceed to early issuance of Letters Patent in due course.

It is believed that no additional fees or charges are currently due. However, in the event that any additional fees or charges are required at this time in connection with the application, they may be charged to applicants' Deposit Account No.07-0832

Respectfully submitted,

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